

1 CIVIL DISTRICT COURT FOR THE PARISH OF EAST BATON ROUGE
2 STATE OF LOUISIANA
3 NO. C582129 DIVISION "D"
4 MARIA CRUZ MALDONADO
Individually and as representative of the ESTATE OF ULVALDO SOTO MARTINEZ,
5 DECEASED, and as Next Friend and Natural Guardian of JUSTIN SOTO-MALDONADO
AND USVALDO JESUS SOTO-MALDONADO,
6 MINORS, AND GILBERTO SOTO MARTINEZ
7 VERSUS
8 KIEWIT LOUISIANA CO., MASSMAN CONSTRUCTION CO., TRAYLOR BROS.,
INC., A JOINT VENTURE D/B/A KIEWIT MASSMAN TRAYLOR CONSTRUCTORS
9 A/K/A KMTC JV, GEC LOUISIANA TIMED MANAGERS, A JOINT VENTURE
PARTNERSHIP, PB AMERICAS, INC. F/K/A/ PARSONS, BRINCKERHOFF, QUADE
10 & DOUGLAS, INC. AS PARTNER OF GEC LOUISIANA TIMED MANAGERS, A
JOINT VENTURE PARTNERSHIP, LPA GROUP INCORPORATED AS PARTNER OF
11 GEC LOUISIANA TIMED MANAGERS, A JOINT VENTURE PARTNERSHIP, G.E.C.
INC. AS PARTNER OF GEC LOUISIANA TIMED MANAGERS, A JOINT VENTURE
12 PARTNERSHIP, ZURICH AMERICAN INSURANCE COMPANY, THE STATE OF
LOUISIANA THROUGH THE DEPARTMENT OF TRANSPORTATION AND
13 DEVELOPMENT AND JL STEEL REINFORCING, LLC.
14
15 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
16 HOUSTON DIVISION
17
18 GUADALUPE ARENAS VARGAS,)
Individually and As Representative of the)
Estate of MARTIN ANASTACIO REYES)
19 OSUNA, Deceased, and As Next Friend of)
ZAID MARTIN REYES ARENAS; JUANA)
20 SYLVIA OZUNA GARCIA; and MARTIN)
REYES ADAME) C.A. NO. 4:09-CV-02521
21)
V.)
22)
KIEWIT LOUISIANA CO., MASSMAN)
23 CONSTRUCTION CO., and TRAYLOR)
BROS., INC., a Joint Venture d/b/a KIEWIT) JURY TRIAL DEMANDED
24 MASSMAN TRAYLOR CONSTRUCTORS;)
KIEWIT LOUISIANA CO.; MASSMAN)
25 CONSTRUCTION CO.; and TRAYLOR)

ORAL AND VIDEOTAPED DEPOSITION OF

CESAR VELADOR MOJICA

VOLUME 1 OF 2

FEBRUARY 17, 2011

ORAL AND VIDEOTAPED DEPOSITION OF CESAR VELADOR
MOJICA, VOLUME 1 OF 2, produced as a witness at the
instance of the Plaintiffs, and duly sworn, was taken
in the above-styled and numbered cause on the 17th day
of February, 2011, from 8:47 a.m. to 6:00 p.m., before
Mary Burkes, CSR in and for the State of Texas,
reported by machine shorthand, at the law firm of
Deutsch, Kerrigan & Stiles, 755 Magazine Street, 2nd
Floor Conference Room, pursuant to Notice, and the
Louisiana Rules of Civil Procedure and the provisions
stated on the record or attached hereto.

1 answer a question. You may say, "Mr. Lyon," or
2 "Mr. Hoefer," or "Ms. Groves, I saw a document before
3 I'd like to look at again before I answer your
4 question."

5 If you need to do that, simply tell us and
6 you'll get all the time that you need. Will you do
7 that?

8 A. Yes.

9 Q. Okay. Now, with that being said, would you
10 tell me where you currently live?

11 A. I live here in Louisiana.

12 Q. And what's the physical address here in
13 Louisiana?

14 A. 910 Pontchartrain Road, Suite T, Jefferson,
15 L.A., 70121.

16 Q. Now, is that an apartment, or is that a house,
17 or what is that?

18 A. The address that I just gave is my -- where I
19 work.

20 Q. Okay. And where do you -- where do you live?

21 A. Where do I live?

22 Q. Yes.

23 A. Here in New Orleans.

24 Q. And the physical address?

25 A. 5229 Citrus Boulevard, Apartment X 173, River

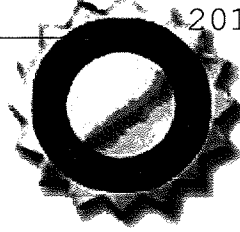
1 THE STATE OF TEXAS)

2 COUNTY OF HARRIS)

3 I, Mary Abbott Burkes, Certified Shorthand
4 Reporter, duly commissioned and qualified in and for
5 the State of Texas, do hereby certify that there came
6 before me on February 17th, 2011, at Deutsch, Kerrigan
7 & Stiles, L.L.P., 755 Magazine Street, New Orleans,
8 Louisiana 70130, the following named person; to wit,
9 CESAR VELADOR MOJICA, who was by me duly cautioned and
10 sworn to testify to the truth and nothing but the truth
11 of his knowledge touching and concerning the matters in
12 this cause; and that said witness was thereupon
13 carefully examined upon his oath and his examination
14 reduced to writing under my supervision; that it is a
15 true record of the testimony given by the said witness,
16 that said witness requested review and signature of the
17 deposition; that changes, if any, made by the witness
18 were returned and are contained on the Correction Page
19 attached to the original transcript.

20 I further certify that I am neither attorney
21 for nor counsel for, nor related to nor employed by any
22 of the parties in the action in which this statement is
23 taken, and further that I am not a relative or employee
24 of any attorney or counsel employed by the parties
25 hereto, nor financially interested in this action.

1 IN WITNESS WHEREOF, I have hereunto affixed my
2 hand and seal of office on this, the _____ day
3 of _____ 2011.



4
5 *Mary Abbott Burkes*

Mary Abbott Burkes,
Certified Shorthand Reporter
In and for the State of Texas
Certification No. 5199

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9
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